

Before the  
Federal Communications Commission  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b) ) MM Docket No.  
Table of Allotments ) RM-\_\_\_\_\_  
FM Broadcast Stations )  
(Beaumont and Dayton, Texas) )  
)  
)  
)  
To: Chief, Allocations Branch )

**SUPPLEMENT TO PETITION FOR RULE MAKING  
(EXPEDITED PROCESSING REQUESTED)**

KXTJ License, Inc., ("KXTJ"), licensee of Station KXTJ(FM), Channel 300C, Beaumont, Texas, by its attorneys, hereby supplements its January 4, 1999, Petition for Rule Making. In that Petition, filed pursuant to Section 1.420(i) of the Commission's Rules, KXTJ requested that the Commission reallocate Channel 300C to Dayton, Texas, as the community's first local aural service, and modify the Station KXTJ license to specify Dayton as the community of license. KXTJ pledged that it would file an application for modification of the KXTJ(FM) license to specify use of the channel at Dayton if it is reallocated to Dayton.

To date, the Commission has not released a Notice of Proposed Rule Making for the Channel 300C reallocation to Dayton, despite the fact that almost a year has passed since KXTJ filed its petition. It has been the Commission's policy to expedite, not delay, the provision and improvement

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of radio service by minority-owned companies, such as KXTJ.<sup>1</sup> The Commission has committed itself to a policy of encouraging minority broadcasters, including the granting of requests by minorities for expedited processing of applications and other filings. Weunschel Broadcasting, Co., Inc., 74 FCC 2d 389 (1979), citing Statement of Policy on Minority Ownership of Broadcast Facilities, 68 FCC 2d 979, 42 RR 2d 1689 (1978); *see also*, Garrett v. FCC, 513 F.2d 1056 (D.C. Cir. 1975) (minority ownership should be taken into account as a positive factor in consideration of engineering proposals).

In an effort to expedite the issuance of a Notice of Proposed Rule Making, KXTJ is proposing herein an alternate reference point for Channel 300C at Dayton, Texas. At its current site, KXTJ is short-spaced, pursuant to Section 73.215 of the Rules, to two stations. The proposed reference point site (30-00-56; 94-31-37) eliminates a short-spacing to Station KTBQ(FM), Nacogdoches, Texas. Although at the proposed reference point there is a remaining short-spacing, to Station KRXZ(FM), Erath, Louisiana, that short-spacing was created by the licensee of Station KRXZ(FM). Thus, but for the Erath short-spacing, created by the Erath licensee, KXTJ would be a fully-spaced station at the proposed reference point. Accordingly, the same rationale that the Commission has applied in granting Section 1.420(i) reallotments to grandfathered short-spaced stations should apply in this case, and Channel 300C should be reallotted to Dayton, Texas as KXTJ has requested herein.

### **BACKGROUND**

KXTJ(FM) operated as a fully-spaced station, on Channel 300C, when it went on the air in 1967. In 1990 the licensee of the station obtained Commission authority to move its transmitter site to its current location which, under Section 73.215 of the Rules, is short-spaced by 2.3 miles to

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<sup>1</sup> El Dorado Communications, Inc., the parent company of KXTJ License, Inc. and its sister company, KQQK License, Inc., is the only Hispanic-owned operator in the Houston radio market.

Station KTBQ(FM), Nacodoches, Texas. Subsequently, the licensee of Station KRXZ(FM), Erath, Louisiana, employed Section 73.215 to obtain Commission authority to relocate the KRXZ(FM) transmitter site to a site short-spaced to Station KXTJ(FM) by 2.8 miles. *See* Technical Statement attached hereto.

The new reference point for the reallocation of Channel 300C to Dayton proposed herein is located 2.5 miles south of the current KXTJ(FM) site. Operation from the reference point site would eliminate the short-spacing to the Nacogdoches station and reduce the short-spacing to the Erath station by 0.2 miles. There is no site to which KXTJ could move KXTJ(FM) that would eliminate entirely the Erath short-spacing without creating short-spacings to other allotments.

The attached Technical Statement contains channel studies for operation of Channel 300C at the current site and at the proposed reference point. It also shows the theoretical gain and loss areas, assuming minimum facilities at both the current site and the reference point site (*i.e.*, a net gain of service to 65,697 people, and a net loss to an area of 420 square kilometers). *See* Technical Statement at p. 5. A comparison of the actual (*i.e.*, not minimum) KXTJ facilities at the current site and assumed minimum facilities at the reference point would result in a theoretical net loss of service in both population and area. *See* Technical Statement at p. 4. However, such theoretical net gains and losses are not significant in this case, where KXTJ has proposed to provide a first local aural service to Dayton, a higher priority in FM allotments. *See* Revision of FM Assignment Policies and Procedures, 90 FCC Rcd 29 (1982). Moreover, the theoretical gain and loss areas are not significant because they are already well-served, receiving five or more reception services. *See* Technical Statement at p. 6.

## DISCUSSION

The Commission has approved the reallocation of a channel where the reallocated channel would be short-spaced under Section 73.215 of the Rules where the proponent of the reallocation has provided an alternate site, for purposes of the rule making proceeding, which meets the Commission's spacing requirements. See Princeton and Elk River, Minnesota, released October 8, 1999. In Princeton and Elk River, the Commission stated that there would be theoretical gain and loss areas at the proposed reference point, but noted that those areas were already well-served (*i.e.*, receive five or more reception services). *Id.* KXTJ's proposal in this case is similar. The alternate reference point for Channel 300C at Dayton, Texas, would eliminate the short-spacing to Station KTBQ(FM), Nacodoches, Texas. The theoretical gain and loss areas created are already well-served. The only difference in this case is that under KXTJ's proposal there will continue to be a short-spacing to Station KRXZ(FM), Erath, Louisiana, though it will be **reduced** by 0.2 miles.

The Erath short-spacing should not prevent KXTJ from providing the public interest benefits of a first local service at Dayton. The Commission has recognized that stations should not be precluded from advancing the public interest through Section 1.420(i) reallocations simply because they have been adversely affected by Commission rule changes. For example, stations that are now short-spaced but were fully spaced prior to the introduction of the Commission's spacing rules in 1965 (so-called "grandfathered" stations) have been reallocated to new communities where the licensees have proposed no site change (and the result is a short-spaced allotment). See Newnan and Peachtree City, Georgia, 7 FCC Rcd 6307(1992).

In Newnan and Peachtree City, the rationale for permitting the reallocation was that a station in compliance with the Commission's Rules when authorized should be afforded the same

opportunity to change its community of license, in conformity with the Rules, where no new short-spacings are created, no existing short-spacings are exacerbated, and there is no increase in the potential for interference. Id., at 6308. The Commission has recently reaffirmed this policy. See Berlin and North Conway, New Hampshire, and Oceanside and Encinitas, California, both released September 10, 1999. Furthermore, the Commission has extended its policy permitting short-spaced allotments to apply to so-called pre-1989 grandfathered short-spaced stations (*i.e.*, stations that became short-spaced as a result of the Commission's 1989 changes to the spacing rules). See Fremont and Holton, Michigan, released October 10, 1999.

The Newnan and Fremont line of cases stand for the proposition that a short-spaced station should be able to change its community of licenses as freely as non short-spaced stations (even when the change results in a short-spaced allotment) when the station did not create the short-spacing that affects its ability to change community of license. But for the introduction of the FM Table of Allotments in 1964 and the Commission's changes to the spacing rules in 1989, stations affected by those actions would not be short-spaced. The reasoning of these cases is equally applicable to situations where a station become short-spaced through the actions of other stations (approved by the Commission) taking advantage of Commission rules such as contour protection methods, and not through actions initiated by the station that seeks a change in community of license.

In this case, KXTJ should not be precluded from providing a first local service to Dayton because KXTJ(FM) has been "boxed in" by another station that created a short-spacing to KXTJ(FM) by taking advantage of the Commission's relaxation of the spacing rules. That relaxation permits the use of contour protection in lieu of strict spacing constraints. KXTJ(FM) was fully-spaced when authorized. It would be fully-spaced at the reference point but for the Erath short-spacing created by the Erath licensee. Furthermore, allowing KXTJ's Dayton proposal at the

reference point would not create any new short-spacings, would not exacerbate any existing short-spacings, and would not increase the potential for interference. These are the paramount criteria recognized by the Commission in the Newnan line of cases cited above. At the reference point, one short-spacing would be eliminated and the remaining one reduced. Thus, the public interest will be served and the integrity of the FM Table of Allotments will be improved, not jeopardized.

The Commission should delay no further the already overdue release of a NPRM in this proceeding. Issuance of an NPRM and reallocation of Channel 300C to Dayton would not require new precedent because the action requested herein is fully in accord with the principals set forth in Princeton and Elk River, Minnesota and the line of cases following Newnan and Peachtree City, Georgia.

Moreover, the Commission should not be concerned that action in this proceeding would open the “floodgates” for applicants seeking new short-spaced allotments. Only stations that are fully-spaced (or that identify a fully-spaced reference point) and stations that are short-spaced due to actions either initiated by the Commission or approved by the Commission would be subject to similar treatment. With these constraints, KXTJ submits that the potential number of similar licensees that would be in a position to seek short-spaced Section 1.420(i) reallocations is very small.

In sum, KXTJ requests that the Commission reallocate Channel 300C to Dayton, Texas. In the alternative, KXTJ requests a waiver of Section 73.207 of the Rules to permit a new, short-spaced allotment at Dayton. A waiver is justified in this case because at the reference point one short-spacing will be eliminated, no new short-spacings will be created, the only existing short-spacing will be reduced, and the potential for interference will not be increased by the reallocation of Channel 300C to Dayton.

## **CONCLUSION**

KXTJ requests that the Commission issue a Notice of Proposed Rule Making to amend the FM Table of Allotments to reallocate Channel 300C, currently allotted to Beaumont, Texas, to Dayton, Texas, as its first local aural service. KXTJ further requests that the Commission amend the license of Station KXTJ(FM) to specify operation on Channel 300C at Dayton, Texas, and submits that it will apply for the channel if reallocated as requested herein.

Respectfully submitted,

**KXTJ LICENSE, INC.**

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Its Counsel

December 2, 1999

TECHNICAL STATEMENT  
PROVIDING SUPPLEMENT  
SUPPORTING A PETITION FOR RULE MAKING  
TO CHANGE CITY OF FM ALLOTMENT

This Technical Statement provides supplemental information supporting the Petition for Rule Making (PRM) from KXTJ License, Inc. to change the city of allotment for FM broadcast station KXTJ on channel 300C (107.9 MHz) from Beaumont, Texas to Dayton, Texas (RM-9526).

Section 73.202 of the Federal Communications Commission (FCC) rules currently shows channel 300C allotted to Beaumont, Texas. It is proposed to change the city for this channel 300C allotment to Dayton, Texas. Although the PRM does not contemplate a change in the KXTJ transmitter site, for purposes of this supplement, an allotment reference point has been assumed. The geographic coordinates for the assumed channel 300C Dayton allotment reference point are 30-00-56, 94-31-37. The assumed allotment reference point is 4 kilometers (2.5 miles) south of the present KXTJ site.

Figure 1 is a separation study for channel 300C at the current KXTJ site. As shown, there are 2 short-spacings. The first is a 3.6 kilometers (2.3 miles) short-spacing with station KTBQ on channel 299C2 (107.7 MHz) at Nacogdoches, Texas. The current KXTJ operation (BLH-



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901213KA) employed Section 73.215 of the FCC rules for this separation.

The second short-spacing is 4.5 kilometers (2.8 miles) with station KRXZ on channel 300C1 at Erath, Louisiana. Station KRXZ employed Section 73.215 of the FCC rules for this separation (BMPH-961107IB, BLH-980817KA). The allotment reference point for channel 300C1 at Erath (29-59-38, 91-43-45) is 270 kilometers from the present KXTJ site, meeting the FCC's minimum separation requirement. In other words, station KRXZ created the short-spacing with respect to station KXTJ on channel 300C.

Figure 2 is a separation study for channel 300C at the assumed Dayton allotment reference site (30-00-56, 94-31-37). As shown, the separation to KTBQ is increased to 188.3 kilometers, meeting the FCC's minimum requirement. The assumed allotment reference point eliminates the short-spacing to station KTBQ.

The separation to the KRXZ site is slightly increased to 265.9 kilometers, reducing the short-spacing caused by KRXZ by 0.4 kilometers (0.2 mile). The separation to the channel 300C1 allotment reference point at Erath is 270 kilometers, still meeting the FCC's minimum separation requirement.

Figure 3 is a map showing the minimum separation arcs in accordance with Section 73.207 of the FCC rules

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from pertinent surrounding assignments. The pertinent arcs are from station KTBQ(FM) on channel 299C2 at Nacogdoches, Texas, station KTBZ(FM) on channel 298C at Lake Jackson, Texas, and the present KRXZ site and allotment reference point for channel 300C1 at Erath, Louisiana. The present KXTJ site and assumed allotment reference point are identified. Although there is no area meeting all of the FCC's minimum separation requirements for channel 300C in the area, the assumed allotment reference site meets all the minimum separations except to KRXZ's present operation. As noted above, KRXZ created the short-spacing with respect to station KXTJ on channel 300C. The present KXTJ site and assumed allotment reference site meet the FCC's minimum separation requirement (270 km) with respect to the channel 300C1 allotment reference point at Erath, Louisiana.

Figure 4 is a map showing the predicted 1 mV/m (60 dBu) contour for the present KXTJ operation on channel 300C (100 kW-DA, 551 m). The map also shows the traditional 72.4 kilometers circle representing the 1 mV/m contour for the assumed channel 300C operation at the proposed Dayton channel 300C allotment reference point. The FCC usually requires minimum Class C transmitting facilities (100 kW, 300 m) to be assumed for Class C allotments, whereas maximum transmitting facilities are assumed for other class (A, B1, B, C1, C2, C3) allotments. As shown, assuming minimum facilities at the reference point, the present KXTJ 1 mV/m contour completely envelopes

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the assumed 1 mV/m contour for the allotment (ie, there would be no gain area).

The estimated population (1990 Census) and land area within the present KXTJ predicted 1 mV/m contour are 2,138,396 people and 20,610 square kilometers. The estimated population and land area within the 1 mV/m (72.4 km) circle for the assumed Dayton channel 300C allotment, assuming minimum facilities, would be 859,986 people and 13,830 square kilometers. On this basis, the proposed allotment change would result in a loss of 1 mV/m coverage to 1,278,410 people within 6,780 square kilometers.

However, showing a comparison between the present KXTJ operation and the assumed Dayton allotment using the FCC's traditional method results in unrealistic theoretical disparity. This disparity is due to a difference in transmitting facilities between the two allotments; the nearly maximum Class C facilities employed by KXTJ (100 kW-DA, 551 m) versus assumed minimum Class C facilities (100 kW, 300 m) for the nearby assumed Dayton allotment. It is like an apples and oranges comparison, somewhat similar to evaluating coverage from a maximum Class C assignment (100 kW, 600 m) with a maximum Class C1 assignment (100 kW, 299 m).

A more realistic and practical method would be to compare equivalent Class C allotments (100 kW, 300 m) at both locations, the present KXTJ site for Beaumont and the

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assumed allotment reference point for Dayton. Since the assumed Class C allotment facilities (100 kW, 300 m) at the present KXTJ site meet the Section

73.215 interference requirements with respect to stations KTBQ and KRXZ, there is further support for this method of comparison.

Figure 5 is a map showing the 1 mV/m (72.4 km) circles for the assumed channel 300C allotments at the present KXTJ site (Beaumont) and the assumed allotment reference point (Dayton).

The estimated population and land area within the 1 mV/m (72.4 km) circle for the assumed channel 300C allotment at the present KXTJ site are 794,289 people and 14,190 square kilometers. As noted above, the estimated population and land area within the 1 mV/m circle for the assumed Dayton allotment are 859,986 people and 13,770 square kilometers. On this comparative basis, the proposed Dayton channel 300C allotment would provide 1 mV/m coverage to 65,697 more people within 420 fewer square kilometers. The following table provides a summary of the 1 mV/m population and area comparisons.

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<u>Description</u>	<u>Population</u>	<u>Land Area</u> <u>(sq km)</u>
Present Beaumont Allotment (100 kW, 300 m, KXTJ site)	794,289	14,190
Proposed Dayton Allotment (100 kW, 300 m, assumed ref. pt.)	859,986	13,770
Region of Common 1 mV/m Coverage	788,781	13,613
Region Losing 1 mV/m Coverage (area inside present 1 mV/m and outside proposed 1 mV/m)	5,508	577
Region Gaining 1 mV/m Coverage (area inside proposed 1 mV/m and outside present 1 mV/m)	71,205	157

The FCC's radio databases (AM & FM) show that five or more other reception services serve the predicted gain and loss areas for the assumed Beaumont and Dayton channel 300C allotments.

Figure 6 is a copy of Figure 5 showing the channel 300C gain and loss areas. The predicted 1 mV/m contours of certain FM stations providing service to the gain and loss areas are shown. The numbers indicate the number of other radio services to that area. Once 5 other reception services were determined, no further searching was performed. There are at least 5 other radio reception services in both the gain and loss areas.

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Figure 7 is a listing of the stations determined to provide predicted service to the gain or loss areas shown in Figure 6.

In summary, it is believed this supplemental information, in association with the previous filing, provides sufficient justification for the FCC to reallocate FM channel 300C from Beaumont, Texas to Dayton, Texas.

A handwritten signature in black ink, reading "John A. Lundin". The signature is fluid and cursive, with the first name "John" and last name "Lundin" clearly legible.

John A. Lundin  
du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, FL 34237-6019

(941) 329-6000

November 16, 1999

## FM SEPARATION STUDY

Job Title :Present KXTJ Site

Separation Buffer 65 km

FCC DB Date : 10/29/99

Channel 300C (107.9 MHz)

Coordinates : 30-03-05 94-31-37

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KKTLMF	Cleveland		246C	100.	30-32-06	318.9	71.45	48
CP	TX	BPH970917IZ	97.1	563.0	95-01-04			CLEAR
amended 4/02/1998								
KKTLMF	Cleveland		246C	100.	30-32-06	318.9	71.47	48
LIC	TX	BLH980226KC	97.1	300.0	95-01-05			CLEAR
K247AF	Galveston		247D	.180	29-19-28	197.2	84.38	0
LIC	TX	BLFT970616TC	97.3	115.0	94-47-08			TRANS
Translator for KSBJ, Humble, TX.								
KJAS	Jasper		297C3	25.	30-53-54	24.1	103.08	96
APP	TX	BPH970918IA	107.3	100.0	94-05-03			CLOSE
From Channel 297A-One Step Application								
	Jasper		297C3		30-53-54	24.1	103.08	96
ALC	TX		107.3	.0	94-05-03			CLOSE
Reserved for KJAS per One-Step Application 970918IA								
KJAS	Jasper		297A	6.	30-58-31	26.5	114.67	95
LIC	TX	BLH960911KE	107.3	100.0	93-59-24			CLEAR
*To amend to Channel 297C3 per One Step Application 970918IA								
KTBJ	Lake Jackson		298C	98.	29-17-16	218.9	108.70	105
LIC	TX	BLH860925KF	107.5	601.0	95-13-53			CLOSE
KRAW	Lake Arthur		298C2	50.0	30-12-07	83.3	153.23	105
CPM	LA	BMPH961023IA	107.5	141.0	92-56-47	SS		CLEAR
One-Step Application from Channel 297C3								
KTBJ	Nacogdoches		299C2	50.	31-42-30	355.2	184.36	188
LIC	TX	BLH891101KB	107.7	150.0	94-41-23		-3.64	SHORT
KXJT	Beaumont		300C		30-03-05	.0	.00	
PDEL	TX	RM9526	107.9	.0	94-31-37			
Change of community-from Beaumont to Dayton								
KXJT	Dayton		300C		30-03-05	.0	.00	
PADD	TX	RM9526	107.9	.0	94-31-37			
Change of community-from Beaumont to Dayton								

FM SEPARATION STUDY

Job Title :Present KXTJ Site

Separation Buffer 65 km

FCC DB Date : 10/29/99

Channel 300C (107.9 MHz)

Coordinates : 30-03-05 94-31-37

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
- KXTJ LIC	Beaumont TX	BLH901213KA	300C 107.9	100. DA 551.0	30-03-05 94-31-37	.0 SS	.00	
KXTJ APP	Beaumont TX	BPH981217IH	300C 107.9	100. DA 595.0	30-07-17 94-40-17	299.3 SS	15.95	
KRXZ LIC	Erath LA	BLH980817KA	300C1 107.9	100. 263.0	30-12-06 91-46-37	85.7 SS	265.53 -4.47	270 SHORT
KRXZ PADD	Erath LA	RM8976	300C1 107.9	.0	29-59-38 91-43-45	90.7	269.97	270 CLOSE
Site Restriction 29.9km East								
KIXS LIC	Victoria TX	BLH860722KB	300C1 107.9	100. 110.0	28-46-03 96-59-11	239.7	277.90	270 CLOSE
KDXXFM LIC	Corsicana TX	BLH870616KA	300C1 107.9	100. 257.0	31-55-00 96-33-24	317.5	283.47	270 CLOSE
*To Channel 300A, Robinson, TX, per D97-91								
KVMAFM, APP	Magnolia AR	BPH990617IC	300C1 107.9	44. DA 416.0	32-54-06 93-44-44	13.0 SS	324.63	270 CLEAR
coordinates as shown on application								

\*\* End of separation study for channel 300C \*\*



## FM SEPARATION STUDY

Job Title :Assumed Reference Point

Separation Buffer 65 km

FCC DB Date : 10/29/99

Channel 300C (107.9 MHz)

Coordinates : 30-00-56 94-31-37

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KKTLFM CP amended 4/02/1998	Cleveland TX	BPH970917IZ	246C 97.1	100. 563.0	30-32-06 95-01-04	320.9	74.48	48 CLEAR
KKTLFM LIC	Cleveland TX	BLH980226KC	246C 97.1	100. 300.0	30-32-06 95-01-05	320.9	74.50	48 CLEAR
K247AF LIC Translator for KSBJ, Humble, TX.	Galveston TX	BLFT970616TC	247D 97.3	.180 115.0	29-19-28 94-47-08	198.1	80.60	0 TRANS
KJAS APP From Channel 297A-One Step Application	Jasper TX	BPH970918IA	297C3 107.3	25. 100.0	30-53-54 94-05-03	23.3	106.71	96 CLOSE
ALC Reserved for KJAS per One-Step Application 970918IA	Jasper TX		297C3 107.3	.0	30-53-54 94-05-03	23.3	106.71	96 CLOSE
KJAS LIC *To amend to Channel 297C3 per One Step Application 970918IA	Jasper TX	BLH960911KE	297A 107.3	6. 100.0	30-58-31 93-59-24	25.6	118.23	95 CLEAR
KTBJ LIC	Lake Jackson TX	BLH860925KF	298C 107.5	98. 601.0	29-17-16 95-13-53	220.2	105.65	105 CLOSE
KRAW CPM One-Step Application from Channel 297C3	Lake Arthur LA	BMPH961023IA	298C2 107.5	50.0 141.0	30-12-07 92-56-47	81.8 SS	153.74	105 CLEAR
KTBJ LIC	Nacogdoches TX	BLH891101KB	299C2 107.7	50. 150.0	31-42-30 94-41-23	355.3	188.32	188 CLOSE
KXJT PDEL Change of community-from Beaumont to Dayton	Beaumont TX	RM9526	300C 107.9	.0	30-03-05 94-31-37	.8	3.98	
KXJT PADD Change of community-from Beaumont to Dayton	Dayton TX	RM9526	300C 107.9	.0	30-03-05 94-31-37	.8	3.98	

FM SEPARATION STUDY

Job Title :Assumed Reference Point

Separation Buffer 65 km

FCC DB Date : 10/29/99

Channel 300C (107.9 MHz)

Coordinates : 30-00-56 94-31-37

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KXTJ LIC	Beaumont TX	BLH901213KA	300C 107.9	100. DA 551.0	30-03-05 94-31-37	.8 SS	3.98	
KXTJ APP	Beaumont TX	BPH981217IH	300C 107.9	100. DA 595.0	30-07-17 94-40-17	310.3 SS	18.22	
KRXZ LIC	Erath LA	BLH980817KA	300C1 107.9	100. 263.0	30-12-06 91-46-37	84.8 SS	265.86 -4.14	270 SHORT
KRXZ PADD	Erath LA	RM8976	300C1 107.9	.0	29-59-38 91-43-45	89.8	269.95	270 CLOSE
Site Restriction 29.9km East								
KIXS LIC	Victoria TX	BLH860722KB	300C1 107.9	100. 110.0	28-46-03 96-59-11	240.4	275.92	270 CLOSE
KDXXFM LIC	Corsicana TX	BLH870616KA	300C1 107.9	100. 257.0	31-55-00 96-33-24	318.0	286.40	270 CLEAR
*To Channel 300A, Robinson, TX, per D97-91								
KVMAFM APP	Magnolia AR	BPH990617IC	300C1 107.9	44. DA 416.0	32-54-06 93-44-44	12.8 SS	328.50	270 CLEAR
coordinates as shown on application								

\*\* End of separation study for channel 300C \*\*

Figure 3

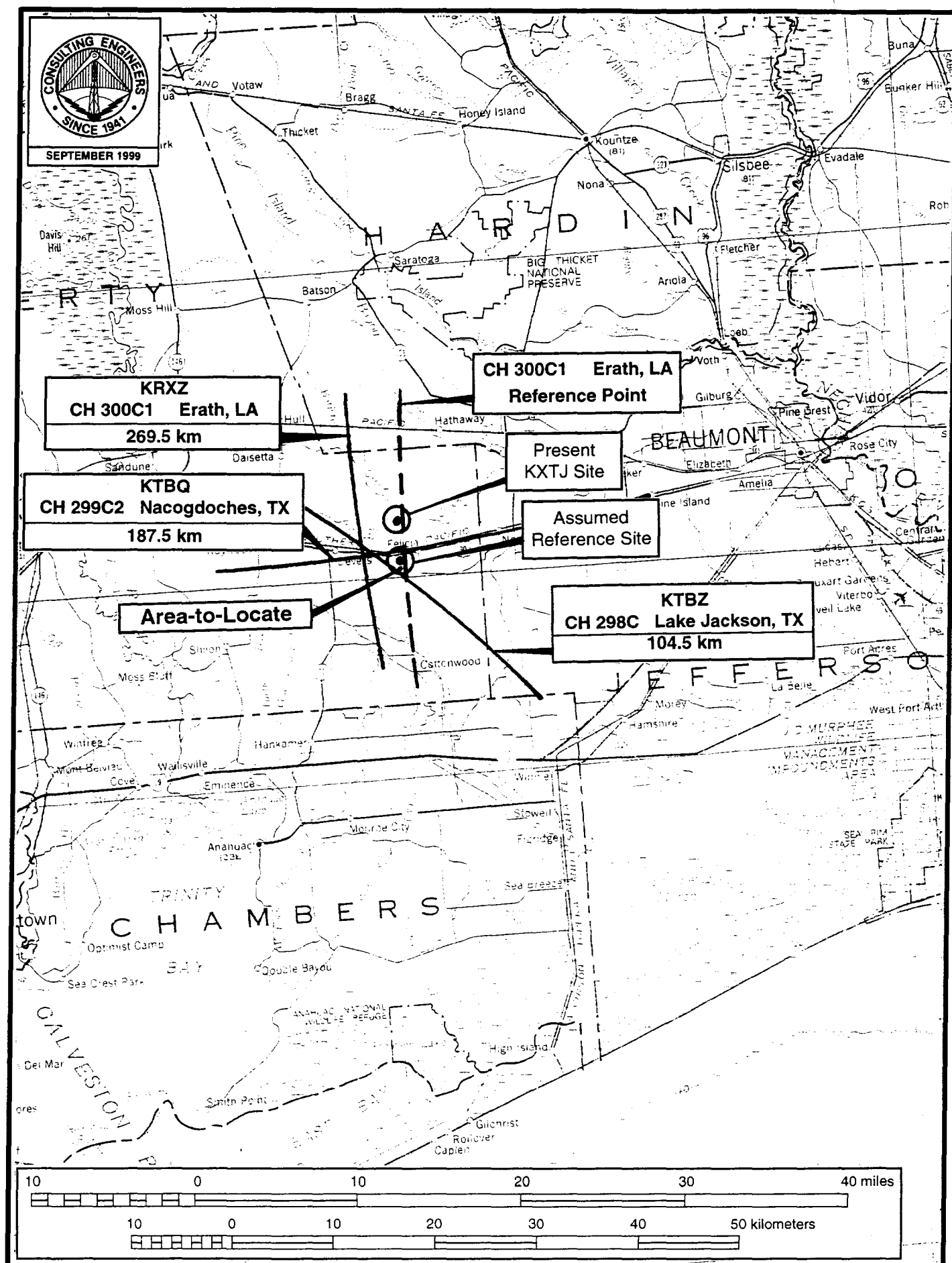
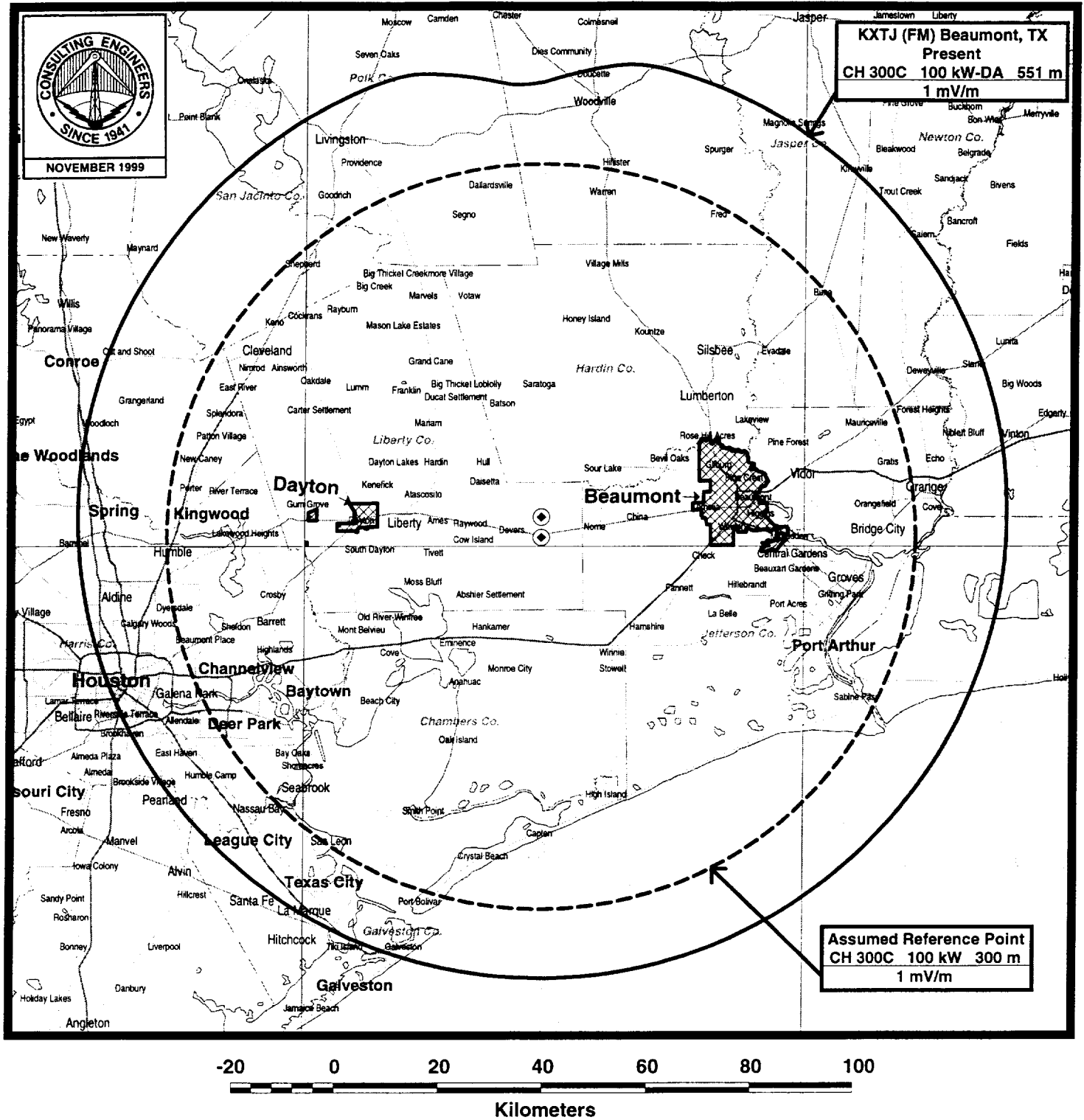


Figure 4



**1 mV/m CONTOURS**

KXTJ(FM)  
BEAUMONT, TEXAS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5

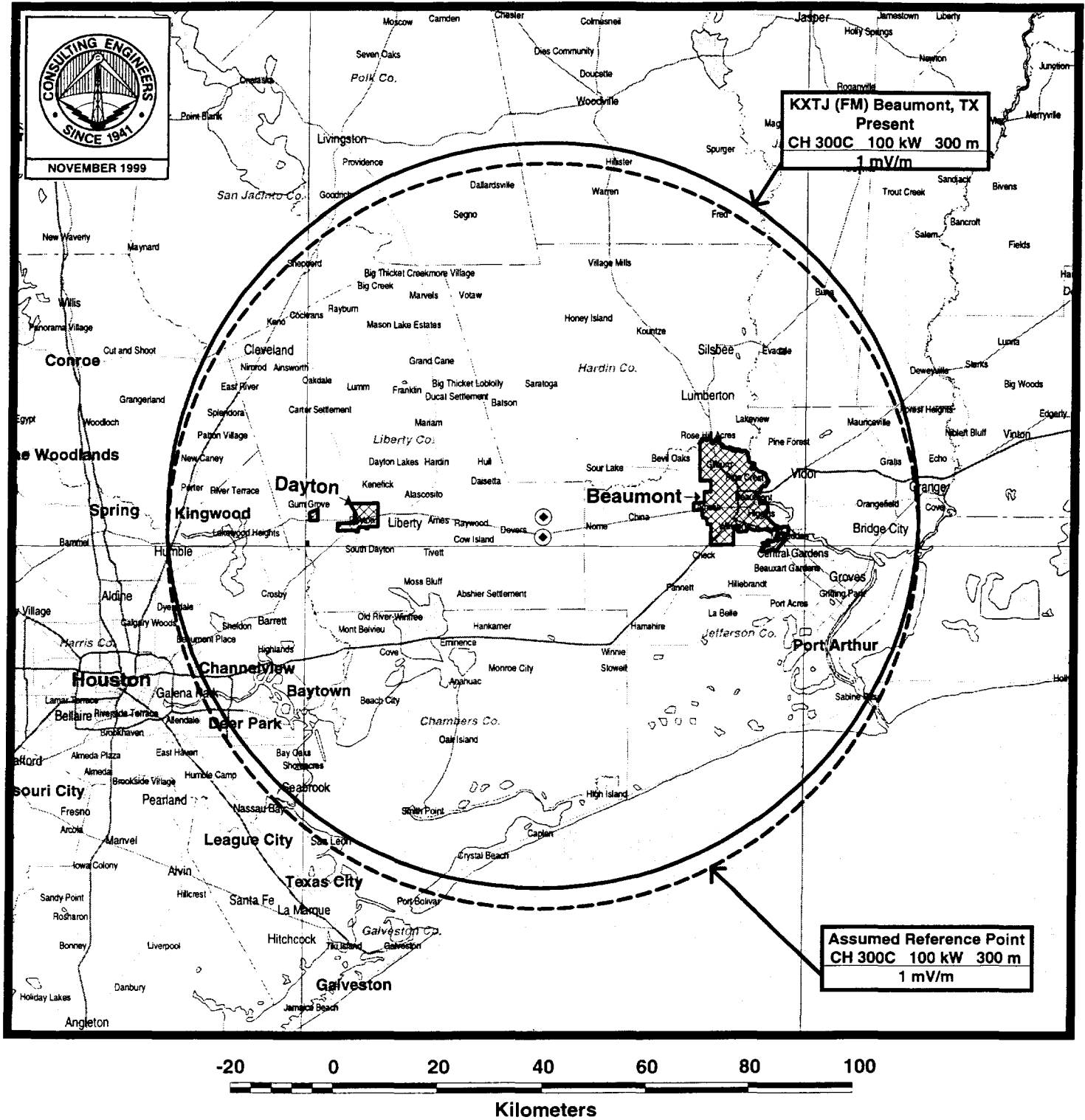
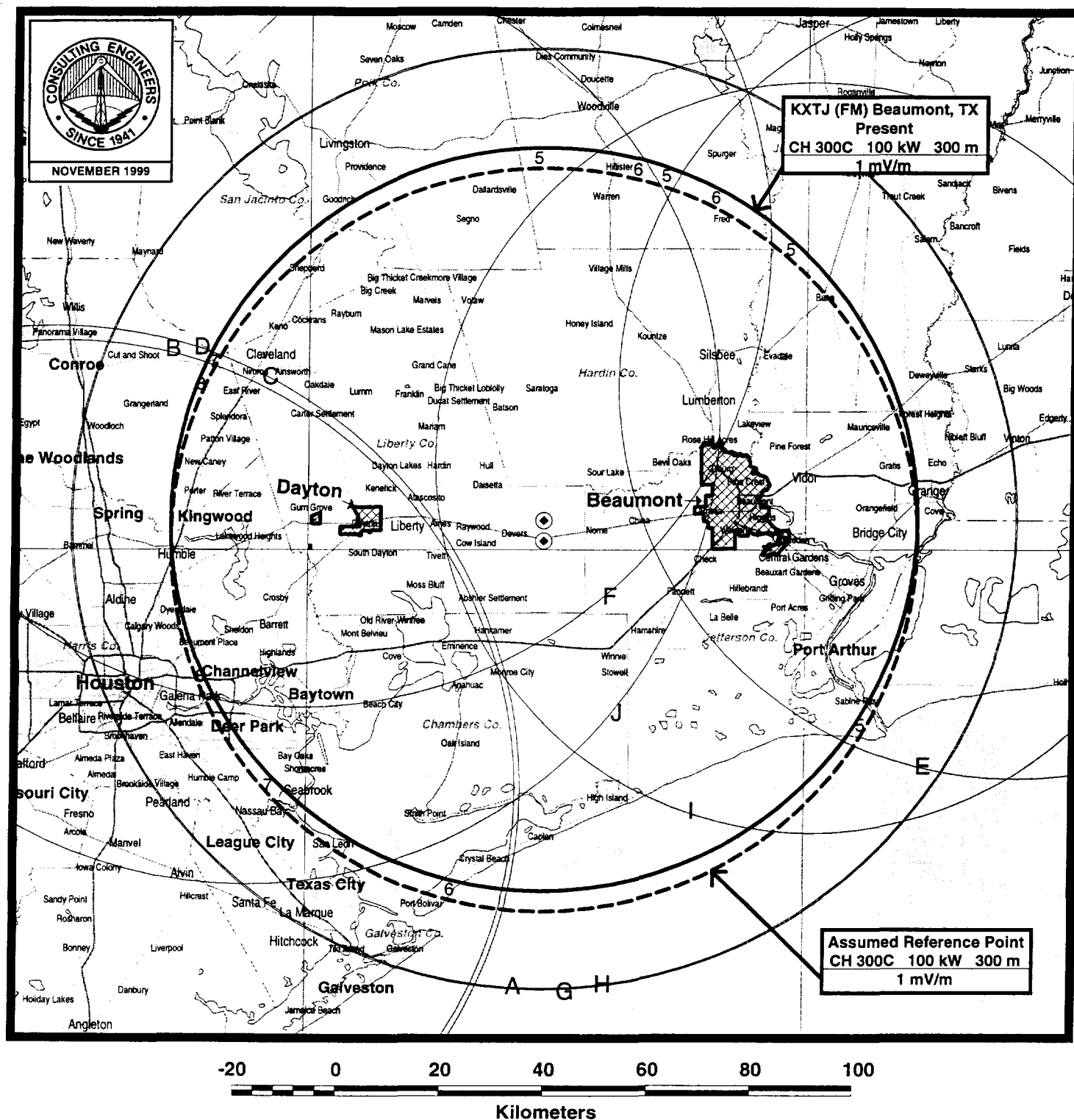


Figure 6

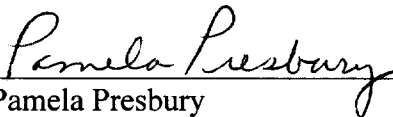


	<u>CHANNEL</u>	<u>CALL SIGN</u>	<u>CITY</u>	<u>STATE</u>
A	227	KOVE-FM	Port Arthur	TX
B	229	KKRW	Houston	TX
C	233	KLDE	Houston	TX
D	239	KIKK-FM	Houston	TX
E	241	KYKZ	Lake Charles	LA
F	246	KKTL-FM(CP)	Cleveland	TX
G	253	KTJM	Port Arthur	TX
H	264	KRTX-FM	Winnie	TX
I	291	KIOC	Orange	TX
J	295	KKHT	Conroe	TX

## CERTIFICATE OF SERVICE

I, Pamela Presbury, an executive assistant in the law offices of Davis Wright Tremaine LLP, do hereby certify that a true copy of the foregoing "Supplement To Petition for Rule Making (Expedited Processing Requested)" was hand delivered, this 2nd day of December, 1999, to the following:

John A. Karousos, Chief,  
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Policy and Rules Division  
Mass Media Bureau  
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Pamela Presbury